

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Special Services Fees and Classifications

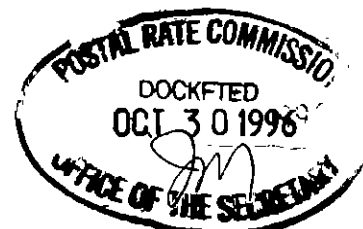
Docket No. MC96-3

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO WITNESS DOUGLAS F. CARLSON
(OCA/DFC-1)
(OCTOBER 30, 1996)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits an interrogatory and request for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, production should be made for inspection at the Office of the Consumer Advocate, 1333 H Street, N.W.,



Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

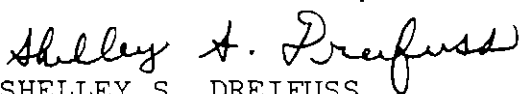
The term "documents" includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term "documents" also includes other means by which information is recorded or transmitted, including microfilms, punch cards, or other cards, and tapes or recordings used in data processing together with any written material necessary to understand or use such punch cards, tapes or other recordings.

Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers. The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were

performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

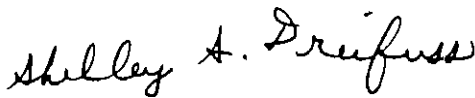
OCA/DFC-1. Refer to your testimony at page 12, lines 8-12, where you assert that the Postal Service's non-resident fee proposal "seems to be based on an assumption that most people obtain nonresident boxes for prestige, business, or convenience reasons" Do you have any concrete evidence concerning the underlying rationale for the Postal Service's proposal for a non-resident box fee? If so, please provide such evidence.

Respectfully submitted,


SHELLEY S. DREIFUSS
Attorney
Office of the Consumer Advocate

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 3.B(3) of the special rules of practice.


SHELLEY S. DREIFUSS
Attorney

Washington, DC 20268-0001
October 30, 1996